

# United States District Court

## DISTRICT OF ARIZONA

UNITED STATES OF AMERICA, Plaintiff,	)	Magistrate Case No. <b>24-07038MJ</b>
	)	
Vs.	)	
	)	COMPLAINT FOR VIOLATION OF
Reyes NUNEZ-Portillo	)	
AKA: Portillo REYES-Nunez,	)	Title 8, United States Code, Section 1326(a),
Reyes NUNES-Portillo	)	enhanced by (b)(1) (Re-Entry After Removal),
208199571	)	Felony
YOB: 1993	)	
Citizen of: Mexico	)	
Defendant	)	
	)	
	)	

The undersigned complainant being duly sworn states:

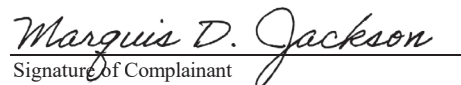
### COUNT 1

That on or about December 22, 2024 Defendant Reyes NUNEZ-Portillo, an alien, was found in the United States at or near Wellton, Arizona, within the District of Arizona, after having been previously denied admission, excluded, deported, and removed from the United States to Mexico through the port of Brownsville-Gateway, Texas, on or about March 12, 2024. The Secretary of the Department of Homeland Security not theretofore having consented to any reapplication by the Defendant for admission into the United States, in violation of Title 8, United States Code, Section 1326(a), enhanced by (b)(1) (Felony).

And the complainant further states that this complaint is based on the attached Statement of Facts incorporated herein by reference.



AUSA Louie Uhl



Signature of Complainant

Marquis D. Jackson  
Border Patrol Agent

Sworn to before me and subscribed telephonically,

December 23, 2024  
Date

at Yuma, Arizona  
City and State

James F. Metcalf, United States Magistrate Judge  
Name & Title of Judicial Officer



Signature of Judicial Officer

Vs.

Reyes NUNEZ-Portillo  
AKA: Portillo REYES-Nunez,  
Reyes NUNES-Portillo  
208199571

### STATEMENT OF FACTUAL BASIS

The complainant states that this complaint is based upon the statements of the apprehending officers, that the Defendant was found and arrested on or about December 22, 2024, near Wellton, Arizona. Questioning of the Defendant by Border Patrol Agents revealed that the Defendant is a citizen of Mexico and not in possession of valid documents allowing him to enter or remain in the United States.

By questioning the Defendant and through record checks, Border Patrol Agents determined the Defendant was first ordered removed at or near Tucson, Arizona on or about September 19, 2015. The Defendant has been removed on five (5) previous occasions. The Defendant was most recently removed on or about March 12, 2024, through the port of Brownsville-Gateway, Texas, subsequent to a conviction in an United States District Court, District of Arizona on or about December 19, 2022, for the crime of Reentry of Removed Alien, a felony.

Border Patrol Agents determined that on or about December 17, 2024, the Defendant re-entered the United States without the Secretary of the Department of Homeland Security having consented to reapplication by the Defendant for admission into the United States.

To the best of my knowledge and belief, the following is a list of Border Patrol law enforcement personnel present during interviews, statements, and questioning of the Defendant in this matter from initial contact through the writing of this document: BPAs Michael Huerta, Salvador M. Aviles, and Afton E. Pearlstein.

To the best of my knowledge and belief, the following is a list of all Border Patrol law enforcement personnel not already mentioned above who were present and/or took part in other parts of this investigation (e.g., arrest, search, proactive investigation, surveillance, etc) from initial field contact through the writing of this document: BPA Michael Buchanan.

*Marguis D. Jackson*  
\_\_\_\_\_  
Signature of Complainant

Sworn to before me and subscribed telephonically,

December 23, 2024  
\_\_\_\_\_  
Date

*J J Matcal*  
\_\_\_\_\_  
Signature of Judicial Officer